





SO ORDERED.

March 25, 2025

Arun Subramanian, U.S.D.J. Dated: April 1, 2025

VIA CM/ECF

The Honorable Arun Subramanian United States District Court Southern District of New York 40 Foley Square, Room 105 New York, NY 10007

Re: Avery Acker et al. v. The Salvation Army, 1:22-cv-01968-AS (S.D.N.Y.)

Dear Judge Subramanian:

Plaintiffs write to seek clarification on the Court's Order with respect to Defendant's letter motion. Dkt. 229, 230. Plaintiffs wish to confirm that they may wait to substitute new named plaintiffs until after this Court's stay is lifted. Contrary timing would run afoul of the purpose of the stay in the first place: efficient litigation of one of the three parallel cases. See Dkt. 209 ("Order").

Thank you in advance for the Court's clarification.

Sincerely,

/s/ Rebecca A. Ojserkis

Christine E. Webber
Joseph M. Sellers
Rebecca A. Ojserkis
1100 New York Ave. N.W., Suite 800
Washington, D.C. 20005
Tel: (202) 408-4600

Tel.: (202) 408-4600 Fax: (202) 408-4699 cwebber@cohenmilstein.com jsellers@cohenmilstein.com rojserkis@cohenmilstein.com Michael Hancock Cohen Milstein Sellers & Toll PLLC 88 Pine Street, 14th Floor New York, NY 10005 Tel.: (212) 838-7797

Fax: (212) 838-7745 mhancock@cohenmilstein.com

/s/ Michael Freedman

Michael Freedman Gay Grunfeld 101 Mission Street, 6th Floor San Francisco, CA 94105 Tel.: (415) 433-6830

Fax: (415) 433-6830 Fax: (415) 433-7104 mfreedman@rbgg.com ggrunfeld@rbgg.com

/s/ Jessica Riggin

Jessica Riggin 1939 Harrison St., Suite 925 Oakland, CA 94612

Tel.: (415) 421-1800 Fax: (415) 421-1700 jriggin@rukinhyland.com

Counsel for Plaintiffs